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NOT FOR SERVICE OF LITIGATION PAPERS

October 11, 2019

**BY ECF and EMAIL**

Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

Re: City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.,  
Case No. 19 Civ. 2645 (AJN) (KHP)

Dear Judge Nathan:

We represent Felix Sater, Daniel Ridloff, Bayrock Group Inc., Global Habitat Solutions, Inc., and RRMI-DR LLC, (the "Moving Defendants"). We write to respectfully request that the Court accept for filing under seal the unredacted version of the Moving Defendants' (i) Declaration of Jill Levi in Support of Motion to Dismiss Amended Complaint with Exhibit A thereto and (ii) Memorandum of Law in Support of Motion to Dismiss The Amended Complaint (collectively, the "Motion Papers").

In accordance with the Court's Individual Practices ¶ 4, we enclose a version of the Motion Papers to remain under seal subject to the Court's approval, a version of the Motion Papers with highlighting reflecting proposed redactions, and a partial loose-leaf set of solely those pages on which the Moving Defendants seek to redact material. In accordance with the Court's Individual Practices, the Moving Defendants filed the proposed redacted version, as well as this letter-motion, on ECF.

All of the proposed redacted material is comprised of, or directly cites to, material that has already been redacted from the First Amended Complaint filed by Plaintiffs on August 30, 2019. Moving Defendants have redacted this material solely to comply with the proposed material redactions already filed by Plaintiffs in this case. Furthermore, the proposed redacted material consists of information covered by the Stipulated Protective Order in this case, which was so ordered by Magistrate Judge Katharine H. Parker on July 8, 2019, and provides for the sealing of such material in accordance with the Court's rules. [ECF No. 51 at 5-6.]

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For all of the foregoing reasons, the Moving Defendants respectfully request that the Court accept for filing under seal the unredacted version of the Moving Papers.

Respectfully submitted,



Jill Levi

cc: All counsel by Email and ECF